

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

JAMES EDWARD (“Dusty”) BROGDON, Jr.,	*	
as Executor of the Estate of Debra Sue Mills,	*	
deceased, and JAMES EDWARD BROGDON, Jr.,	*	
and RONALD BRIAN (“Rusty”) BROGDON,	*	
Individually and as surviving children of	*	CIVIL ACTION FILE
Debra Sue Mills,	*	
	*	NO. 4:23-cv-00088-CDL
and	*	
	*	
JAMES EDWARD BROGDON, Jr.,	*	
as Executor of the Estate of Herman Edwin Mills,	*	
deceased, and JASON EDWIN MILLS,	*	
Individually and as surviving child	*	
of Herman Edwin Mills,	*	
	*	
	*	
Plaintiffs,	*	
	*	
	*	
v.	*	
	*	
FORD MOTOR COMPANY,	*	
	*	
	*	
Defendant.	*	

**PLAINTIFFS REVISED NOTICE OF DEPOSITIONS PLAINTIFFS INTEND
TO USE AT TRIAL**

Pursuant to Court Order, Doc. 178, Plaintiffs filed, on November 27, 2024, their Notice of depositions they either have to or may have to use at trial. Doc. 248.¹ At 6:14 p.m. on

¹ It remains Plaintiffs’ counsels’ intent to play as few videotaped depositions as possible at the trial of this case, but that is largely out of the control of Plaintiffs’ counsel. Plaintiffs *will use* the videotaped depositions of current or former Ford employees whom Plaintiffs deposed in the past, for the obvious reason that Plaintiffs have already conducted their trial cross-examination of such

December 19, 2024 Ford filed a “Notice of Ford’s Amended Objections to Plaintiffs’ Deposition Designations. Doc. 298. In that document Ford objected to certain passages in three of the depositions identified by Plaintiffs on grounds the Court’s December 17, 2024 rulings on motions in limine “sustained” the objections made by Ford on December 19, 2024.

The revisions herein do three things:

1. In several places Plaintiffs’ Doc. 248 contained this statement: “If Ford counter designates from the direct examination by Ford then” Plaintiffs designate certain additional passages. Since Ford did not counter-designate any passages from any of the six Ford engineers deposed by Plaintiffs’ counsel in Hill v. Ford, those references are deleted.
2. One additional designation is made from the deposition of Ford engineer Jason Balzer: 1150/23-1154/1
3. Plaintiffs respond to Ford’s claims that the Court’s December 17, 2024 rulings “sustained” Ford’s December 19, 2024 objections by withdrawing certain passages from Plaintiff’s November 27, 2024 designations.

Otherwise, Plaintiffs’ November 27, 2024 designations (Doc. 248) remain unchanged.

This Revised Notice includes the name of the deponent, the date the deposition was taken, the basis for using the deposition at trial under Rule 32(a), and the docket number of the complete deposition.

Each of the following witnesses live outside subpoena range, more than 100 miles from 120 12th Street, Columbus GA, and use of their depositions is therefore allowed under Rule 32(a)(4)(B) and (D). (Ford has not disputed that statement.)

witnesses and Ford is not entitled to have a ‘preview’ of that then object to the use of the videotaped depositions by purporting to bring those same witnesses ‘live.’ *See* witnesses listed under “A” and “B” below. Plaintiffs will attempt to bring live to trial those witnesses listed below who live in southwest Georgia outside the subpoena range. *See* “C” below - treating physicians and scene witnesses. But in case that isn’t possible, this Notice includes page and line designations from their depositions.

As to all of these depositions only portions will be presented by Plaintiffs, and for each witness this Notice includes the page and line numbers of the deposition testimony.

Ford already has each of these depositions and they have been filed on the docket. Ford also has the videotapes of these depositions. After Ford has made any counter-designations and the Court has ruled on any objections, if Ford wants to see an actual copy of the videotaped deposition with designations and counter-designations as adjusted according to any Court rulings on objections, Plaintiffs will make that available by 14 days before trial (January 20, 2025).

A. From the trial transcript in the second *Hill* trial (August 2022)²

Carl Zaas 8/4/22 (Dep. taken 8/17/17), *See* Doc. 182

Hill2 TT Vol. 8, *See* Doc. 199

986/24-987/7

987/11-989/25

990/5-991/12

992/6-18

994/4-17

995/16-997/9

1003/24-1004/12

1004/21-1005/12

1007/24-1009/2

1011/2-1012/22

1014/1-6

² For the Court: These are already designated depositions of Ford engineers taken in *Hill v. Ford* and actually played at the second *Hill* trial in August 2022, excepting deletions from those designations, including passages wherein witnesses discussed the Hill wreck or *Hill* case. These are depositions about the subject roof. Plaintiffs' counsel and Ford counsel have already been through the designation/counter-designation/objections/court rulings and other 'fussing' process in the *Hill* case. Plaintiffs' counsel see no reason to subject counsel or the Court to having to go through that process again.

1019/11-13³

Sal Caruso 8/4/22 (Dep. taken 8/18/17), *See* Doc.184

Hill2 TT Vol. 8, *See* Doc. 200

1023/8-16

1023/24-1032/16

1039/18-1043/8

Jason Balzer 8/5/22 (Dep. taken 8/22/17), *See* Doc. 181

Hill2 TT Vol.9, *See* Doc. 201

[it is unclear from the printed transcript where the Court Reporter swore in the witness; that part of the deposition will be captured on the edited videotape, if possible]

1101/4-13

1101/23-1102/19

1103/8-1105/2

1106/11-1113/23

1114/3-1125/18

1125/24-1127/11

1128/20-1129/3

1129/17-23

1130/16-20

1131/16-1139/1

1139/8-9

1139/14-1141/16

1142/15-1144/3

1144/11-20

1146/9-1147/17

1150/23-1154/1

³ Plaintiffs designate this to be played whether or not Ford designates from its direct examination.

Joseph Weishaar 8/5/22 (Dep taken 8/24/17), *See* Doc. 185

Hill2 TT Vol. 9, *See* Doc. 202

1155/4-1158/2

1158/13-1169/9

1170/1-1176/14

1176/18-1178/22

1179/19-1182/14

1183/4-1191/23

Steve Kozak 8/5/22 (Dep. taken 8/22/17), *See* Doc. 183

Hill2 TT Vol.10, *See* Doc. 203

1230/5-1231/19

1231/25-1240/13

1240/17-1247/12

1248/15-1249/5

Lawrence Queener 8/5/22 (Dep. taken 8/24/17), *See* Doc. 186

Hill2 TT Vol.10, *See* Doc. 204

1254/14-1256/20

1258/7-25

1259/6-1272/15

1273/22-1274/5

Ramnarian Krishnaswami 8/5/22 (Dep. taken 6/22/17), *See* Doc. 180

Hill2 TT Vol.10, *See* Doc. 227

1274/19-1275/13

Plaintiffs will also read portions of the Hill1 TT that were read to the jury in the Hill2 trial:

1280/1-13

1286/5-1289/1

1290/9-18

1292/9-1293/2

B. From depositions taken in Mills (Brogdon) v. Ford – Ford current or former employees

Ridha Baccouche (Dep. taken 9/18/24), *See* Doc. 175-2

8/21-9/9

9/17-22

10/2-3

10/11-15

10/17

10/21-11/7

12/7-10

13/5-7

13/10-25

14/3-10

14/14

15/24-16/5

16/7-171

24/11-16

24/20-25/1

24/4

31/16-20

47/3-10

47/12-15

48/7-17

48/22-23

49/2-3

49/12-21

49/23

Derrick Kuzak (Dep. taken 9/19/24), *See* Doc. 196

9/13-18

12/6-13/18

13/23 (starting at “Dr. Kuzak”) – 15/3

16/7-12

20/16 (starting at “Dr. Kuzak”) – 20/20

20/23-21/6

21/8-21/15

21/18-21

21/23-25

22/3-4

23/7-24/1

27/4 (starting at “Dr. Kuzak”) – 27/8

27/14-28/11

28/14-16

28/18

36/23-37/1

37/4-15

37/19-21

37/23-25

38/2-8

38/10-11

38/13-14

38/17-39/2

39/4-5

Ramnarian Krishnaswami (Dep. taken 9/17/24), *See* Doc. 187

7/5-13/23

14/22-20/1

21/7-21/22

22/1-30/13

33/20-34/6

35/18-39/16

41/15-44/6

45/23-46/9

47/9-12

50/19 –54/24

56/6-57/12

59/20-60/4

67/22-69/1

69/17-73/3

74/13-75/7

80/25-81/1

C. From depositions taken in Mills (Brogdon) v. Ford – treating physicians and scene witnesses

William Ellis, M.D. (Dep. taken 7/17/24), *See* Doc. 120

6/1-8/22

65/21-67/23

71/11-72/15

74/1-77/23

78/1-22

79/8-94/18

96/2-17

Sydney Cochran, M.D. (Dep. taken 7/16/24), *See* Doc 121

5/9-8/7

10/23-11/3

11/22-14/21

18/11-19/20

20/18-23

112/10-123/4

Brian Palmer (Dep. taken 12/14/23), *See* Doc. 56

5/3-10/16

10/23-13/19

14/21-21/12

28/18-25

32/23-33/10

33/15-24

34/3-35/17

35/24-36/21

38/2-11

39/6-21

40/24-42/20

53/15-23

56/5-57/21

58/19-59/11

60/2-64/19

66/24-69/9

69/13-70/18

71/11-13

72/9-14

76/1-2

79/10-15

Jacob Sanchez (Dep. taken 1/23/24), *See* Doc 61

5/1-6/23

7/19-14/14

15/9-17/25

20/22-22/1

26/17-30/15

33/25-34/3

38/20-40/18

42/3-13

45/21-48/2

53/23-54/14

56/6-12

56/22-57/3

75/5-14

78/20-79/15

80/18-81/25

83/9-89/14

90/18-98/22

WITHDRAWN: 98/23-99/18

99/21-100/20

101/15-102/12

104/4-106/20

Anthony Harrison (Dep. taken 12/14/23), *See* Doc 55

5/1-11/6

13/2-22

18/3-25/19

26/15-28/16

29/13-30/6

31/15-32/15

33/6-34/12

35/4-37/22

43/1-19

47/23-61/23

62/11-63/6

68/4-9

69/18-70/24

Jimmy Lee Cooper (Dep. taken 12/14/23), *See* Doc. 58

5/4-6/14

7/10-10/3

12/23-15/25

19/1-20/3

21/1-28/8

38/3-45/10

Kristen Drexler (Dep. taken 12/15/23), *See* Doc. 59

5/2-9/21

11/5-13/3

15/7-12

17/2-18/14

20/23-21/4

21/23-22/3

23/10-18

24/16-29/10

30/14-17

31/7-37/20

41/11-42/14

46/24-50/14

52/2-53/3

58/5-59/1

61/16-19

62/3-64/1

66/12-25

Courtney Pollock (Dep. taken 1/23/24), *See* Doc. 60

5/6-7/11

7/21-10/7

11/7-12/2

12/14-18

14/11-16/20

WITHDRAWN: 17/7-21

19/9-21/8

22/14-24/17

25/1-28/17

30/10-31/9

32/11-33/1

33/22-34/1

36/11-37/5

38/6-40/20

Trenton Russ (Dep. taken 12/15/23), *See* Doc. 168

5/3-8/19

9/17-23

10/18-11/9

11/24-13/23

17/9-18/16

18/25-23/20

24/25-27/1

30/18-34/7

35/9-38/22

Brett Wilkinson (Dep. taken 12/15/23), *See* Doc. 198

5/3-8/12

10/9-11/3

12/23-13/1

14/1-17/8

17/22-22/20

27/25-31/1

31/19-32/15

34/18-36/10

37/8-38/15

Respectfully submitted, this 23rd day of December, 2024.

/s/ James E. Butler, Jr.

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**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

JAMES EDWARD (“Dusty”) BROGDON,	*	
Jr., as Executor of the Estate of Debra Sue	*	
Mills, deceased, and JAMES EDWARD	*	
BROGDON, Jr., and RONALD BRIAN	*	
(“Rusty”) BROGDON, Individually and as	*	
surviving children of Debra Sue Mills,	*	
	*	
and	*	
	*	
JAMES EDWARD BROGDON, Jr., as	*	CIVIL ACTION FILE
Executor of the Estate of Herman Edwin	*	NO. 4:23-cv-00088-CDL
Mills, deceased, and JASON EDWIN	*	
MILLS, Individually and as surviving child	*	
of Herman Edwin Mills,	*	
	*	
Plaintiffs,	*	
	*	FORD’S OBJECTIONS AND
v.	*	COUNTER DESIGNATIONS TO
	*	PLAINTIFFS’ DEPOSITION
FORD MOTOR COMPANY,	*	DESIGNATIONS
	*	
Defendant.	*	

**NOTICE OF FORD MOTOR COMPANY’S
AMENDED OBJECTIONS TO PLAINTIFF’S DEPOSITION DESIGNATIONS**

Defendant Ford Motor Company (“Ford”), pursuant to the Court’s December 17, 2024 Order (Doc. 297), submits its (amended) objections and counter-designations to Plaintiffs’ twenty (20) deposition designations.¹

In order to assist the Court and streamline this process where possible, Ford offers the

¹ Plaintiffs have indicated they may instead call some of the fact witnesses whose depositions they have designated as live witnesses at trial. Ford asks that Plaintiffs inform the Court and Ford of their decision regarding which witnesses they will call live and which they intend to present via deposition testimony no later than January 17, 2024, so that Ford may prepare accordingly for trial. Of note, any non-party witnesses that reside in Georgia can be compelled by subpoena to attend trial in Columbus. *See* Fed. R. Civ. P. 45(c)(1)(B) and Advisory Committee Notes.

following chart (or legend) that attempts in good faith to provide a categorical overview of many of Ford’s objections to questions posed to Ford’s fact-witness engineers. *None* of the current or former Ford engineers were deposed as corporate representatives. In addition, Ford has also intended to amend this pleading to reflect the Court’s Pretrial rulings; however, in order to preserve these issues for appellate purposes, Ford does not waive or withdraw its original objections.

Color	Objection/Bases	
Green	These questions are primarily lacking in foundation, are lacking in the witness’s personal knowledge and/or call for a speculative answer. Accordingly, these questions are improper and should be disallowed by Fed. R. Evid. 602 and other similar objections. Of note, these questions may also suffer from other evidentiary difficulties as more specifically set forth within this pleading.	
Yellow	These questions are systemically “front-loaded” with irrelevant and impermissible lawyer colloquy, inadmissible comments and argumentative “testimony” from the lawyer as opposed to the witness. As such, these questions are improper and should be disallowed by Fed. R. Evid. 611 and other similar objections. These questions may also suffer from other evidentiary difficulties as more specifically set forth within this pleading.	
Pink	These questions tend to include improper references to improper “other similar incident” or OSI evidence. Sometimes there is a specific reference to a particular other Super Duty roof/structure lawsuit; sometimes the reference is a less specific prefatory (and erroneous) comment regarding a certain number of lawsuits where an occupant has been injured or killed in a Ford Super Duty truck. These questions are improper and should be disallowed by Fed. R. Evid. 403 and 802. These questions may also suffer from other evidentiary difficulties as more specifically set forth within this pleading.	

A. From the trial transcript in the second Hill trial (August 2022)

Trial Testimony Carl Zaas August 4, 2022

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
986	24	987	7		
987	11	989	25		
990	5	991	12	FRE 402, 403, 611	
992	6	992	18	FRE 402, 403, 611	
994	4	994	17		
995	16	997	9	While Ford does not object to this entire designation, it does object to the specific portion of this designation as follows:	
996	3	996	12	FRE 402, 403, 611	
996	22	997	3	FRE 402, 403, 611	
1003	24	1004	12		
					1001:3 - 1001:17 1003:21:1003:23
1004	21	1005	12	FRE 602, 611	
					1005:23-1006:4
1007	24	1009	2	FRE 402, 403, 602, 611	
					1010:8-1010:18
1011	2	1012	22	FRE 402, 403, 602, 611	
1014	1	1014	6		
					1014:9-1019:3
1019	11	1019	13	FRE 602, 611	
1019	6	1020	20		

Trial Testimony Sal Caruso August 4, 2022

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
1023	8	1023	16		
1024	1	1032	16	FRE 402, 403, 602, 611 Ford objects to this designation, in its entirety, based on lack of foundation. Ford further objects to certain other portions (or sub-sections) of this particular designation as set forth below.	
1024	13	1024	18	FRE 402, 611	
1028	8	1028	10	FRE 402, 403, 611	
1029	13	1029	17	FRE 402, 403, 611	
1029	23	1030	5	FRE 402, 403, 611	
1030	19	1030	21	FRE 611	
1031	25	1032	13	FRE 402, 403, 602, 611	
1039	18	1043	8	FRE 402, 403, 602, 611 Ford objects to this designation, in its entirety, based on lack of foundation. Ford further objects to certain other portions (or sub-sections) of this particular designation as set forth below.	
1039	18	1040	25	FRE 403, 602, 611	
1041	15	1042	4	FRE 403, 602, 611	
1042	5	1043	8	FRE 403, 603, 611, 802	
1043	9	1059	7		
1043	9	1043	16	FRE 403, 602, 611, 802	
1043	17	1044	3	FRE 403, 602, 611	
1044	17	1044	21	FRE 403, 602, 611	
1044	22	1045	16	FRE 402, 403, 611, 802	
1046	2	1049	2	FRE 402, 403, 611	

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
1051	23	1052	10	FRE 402, 403, 602, 611	
1052	12	1054	21	FRE 402, 602, 611	
1055	12	1056	10	FRE 402, 403, 602, 611	
1056	11	1057	14	FRE 402, 403, 602, 611 Duplicative	
1058	8	1058	16	FRE 403, 602, 611	
					1059:10-1063:2
1064	14	1065	9	FRE 402, 403, 602, 611	
					1065:13-1065:21

Trial Testimony Jason Balzer August 5, 2022

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
1101	4	1101	13		
1101	23	1102	19		
					1102:20-1103:7
1103	8	1105	2	FRE 402, 403	
1106	11	1113	23	While Ford does not object to this entire designation, Ford does object to certain other portions (or sub-sections) of this particular designation as set forth below.	
1109	2	1112	11	FRE 602, 611	
1114	3	1125	18	FRE 602, 611	
1125	24	1127	11	FRE 602, 611	
1128	20	1129	3	FRE 602, 611	
1129	17	1129	23	FRE 602, 611	
1130	16	1130	20	FRE 602, 611	

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
1131	16	1139	1	FRE 402, 403, 602, 611	
1139	8	1139	9	FRE 602, 611	
1139	14	1141	16	FRE 602, 611	
					1142:8-1142:10
1142	15	1144	3		
1144	11	1144	20	FRE 602, 611	
1146	9	1147	17	FRE 602, 611	
					1147:20-1150:20
1151	2	1151	6	FRE 602, 611	
1151	10	1151	16	FRE 602, 611	

Trial Testimony Joseph Weishaar August 5, 2022.

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
1155	4	1158	2		
1158	13	1169	9	While Ford does not object to this entire designation, Ford does object to certain other portions (or sub-sections) of this particular designation as set forth below.	
1159	15	1160	23	FRE 403, 602, 611	
1167	25	1168	1	FRE 403, 602, 611	
1168	17	1169	5	FRE 403, 602, 611	
1170	1	1176	14	While Ford does not object to this entire designation, Ford does object to certain other portions (or sub-sections) of this particular designation as set forth below.	
1170	1	1170	5	FRE 403, 602, 611; Calls for legal conclusion.	
1171	21	1174	25	FRE 403, 602, 611	

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
1176	18	1178	22	While Ford does not object to this entire designation, Ford does object to certain other portions (or sub-sections) of this particular designation as set forth below.	
1176	2	1176	14	FRE 403, 602, 611	
1179	19	1182	14	While Ford does not object to this entire designation, Ford does object to certain other portions (or sub-sections) of this particular designation as set forth below.	
1180	20	1182	14	FRE 403, 602, 611	
1183	4	1191	23	While Ford does not object to this entire designation, Ford does object to certain other portions (or sub-sections) of this particular designation as set forth below.	
1183	4	1185	3	FRE 403, 602, 611	
1188	24	1191	10	FRE 403, 602, 802 611	
					1192:1-1195:9
1195	12	1195	14		
					1195:15-1196:3
1196	4	1197	1	FRE 602, 611	
1197	22	1197	24		

Trial Testimony Larry Queener August 5, 2022

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
1254	14	1256	20	While Ford does not object to this entire designation, Ford does object to certain other portions (or sub-sections) of this particular designation as set forth below.	

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
1255	3	1255	11	FRE 402	
1256	8	1256	20	FRE 402	
1258	7	1258	25	FRE 602, 611	
1259	6	1272	15	While Ford does not object to this entire designation, Ford does object to certain other portions (or sub-sections) of this particular designation as set forth below.	
1259	6	1259	12	FRE 402, 403, 602, 611	
1259	13	1259	16	FRE 402, 611	
1260	12	1261	9	FRE 402, 403, 602, 611, 802	
1261	24	1261	25	FRE 602	
1262	11	1262	20	FRE 602	
1263	18	1266	17	FRE 402, 403, 602, 611	
1267	19	1267	22	FRE 403, 602, 611	
1268	3	1269	5	FRE 403, 602, 611	
1270	2	1270	4	FRE 403, 602, 611	
1271	3	1272	15	FRE 403, 602, 611	
1273	22	1274	5	FRE 402, 403, 611	

Trial Testimony Ram Krishnaswami August 5, 2022

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
1274	19	1275	13	FRE 402, 611	
					1275:22-1276:24
					1278:7-1278:23
1280	1	1280	13	FRE 611	
					1281:2-1281:7

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
					1281:19-1282:2
1286	5	1289	1	While Ford does not object to this entire designation, Ford does object to certain other portions (or sub-sections) of this particular designation as set forth below.	
1286	5	1286	8	FRE 402, 611	
1288	11	1289	1	FRE 403, 602, 611, 802	
1290	9	1290	18	FRE 402, 403, 602, 611	
1292	9	1293	2		

Trial Testimony Ram Krishnaswami Hill v. Ford Vol. 15 Trial Transcript.

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
					1614:5-10
					1614:19 - 1615: 11

Trial Testimony Steve Kozak August 5, 2022

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
1230	5	1231	19		
1231	25	1240	13	While Ford does not object to this entire designation, Ford does object to certain other portions (or sub-sections) of this particular designation as set forth below.	
1232	15	1234	1	FRE 403, 602, 611	
1234	8	1237	7	FRE 403, 602, 611	
1238	6	1238	15	FRE 403, 602, 611	

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
1240	17	1247	12	While Ford does not object to this entire designation, Ford does object to certain other portions (or sub-sections) of this particular designation as set forth below.	
1240	17	1242	4	FRE 403, 602, 611	
1242	6	1242	19	FRE 402, 602, 611	
1243	3	1245	4	FRE 602, 611	
1245	6	1245	10	FRE 611	
1245	12	1245	25	FRE 602, 611	
1246	1	1247	10	FRE 602, 611	
1248	15	1249	5	FRE 403, 602, 611	
					1252:8-1253:15

B. From depositions taken in Mills (Brogdon) v. Ford - Ford current or former employees

Deposition of Ridha Baccouche taken September 18, 2024

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
8	21	9	9		
9	17	9	22	FRE 602	
10	2	10	3		
10	11	10	15	FRE 602	
10	17	10	17	FRE 602	
10	21	11	7		
12	7	12	10		
13	5	13	7	FRE 602	
13	10	13	25	FRE 602	
14	3	14	10		
14	14	14	14		

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
15	24	16	5		
16	7	17	1	FRE 403, 611	
24	11	24	16		
24	29	25	1	FRE 602	
24	4	24	4		
					27:20-28:6 30:8-30:13 30:20-31:15
31	16	31	20		
					31:21-33:15 33:18-34:10 34:14-34:21 35:4-35:7 35:13-35:14 35:17 35:23-36:7 36:12-36:23 37:5-38:1 38:10-38:12 38:19-39:23 40:17-42:17 42:21-44:14 44:17-44:20 44:25-45:15 45:18-46:3 46:6-46:10
47	3	47	10		
47	12	47	15		
48	7	48	17	FRE 402, 403, 611	
48	22	48	23	FRE 402, 403, 611	
49	2	49	3	FRE 402, 403, 611	
49	12	49	21	FRE 402, 403, 611	
49	23	49	23	FRE 402, 403, 611	
					50:6-50:10

Deposition of Derrick Kuzak taken September 19, 2024.

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
9	13	9	18		
					9:19-10:15 11:14-21
12	6	13	18		
					11:24-12:5
13	23	15	3		
					15:4-15:11 15:16-16:6
16	7	16	12		
					16:17-20:1 20:4-20:8
20	16	20	20	FRE 602, 611	
20	23	21	6	FRE 602, 611	
21	8	21	15	FRE 602, 611	
21	18	21	21	FRE 602, 611	
21	23	21	25	FRE 602, 611	
22	3	22	4	FRE 602, 611	
23	7	24	1		
					24:2-24:4 24:7-24:8 24:13-25:9 25:12-25:12 25:14-25:16 25:20-25:21
27	4	27	8	FRE 602, 611	
					27:11-27:13
27	14	28	11	FRE 602, 611	
28	14	28	16	FRE 602, 611	
28	18	28	18	FRE 602, 611	
					28:20-36:22

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
36	23	37	1	FRE 602, 611	
37	4	37	15	FRE 602, 611	
37	19	37	21	FRE 602, 611	
37	23	37	25	FRE 602, 611	
38	2	38	8	FRE 602, 611	
38	10	38	11	FRE 602, 611	
38	13	38	14	FRE 602, 611	
38	17	39	2	FRE 602, 611	
39	4	39	5	FRE 602, 611	
					39:17-40:15 40:25-42:5 44:25-45:6

Deposition of Ram Krishnaswami taken September 17, 2024.

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
7	5	13	23	While Ford does not object to this entire designation, Ford does object to certain other portions (or sub-sections) of this particular designation as set forth below.	
7	5	8	16	FRE 402, 403, 611	
8	24	9	1	FRE 402, 403, 611	
9	15	10	14	FRE 402, 403, 611	
10	19	10	22	FRE 402, 403, 611	
11	4	11	20	FRE 402, 403, 611	
13	12	13	21	FRE 402, 403, 611	
14	22	20	1	While Ford does not object to this entire designation, Ford does object to certain other portions (or sub-sections) of this particular designation as set forth below.	

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
14	22	15	12	FRE 402, 403, 611, 802	
15	19	17	16	FRE 402, 403, 611, 802	
18	12	18	15	FRE 602	
18	18	19	24	FRE 402, 403, 602, 611	
21	7	21	21		
22	1	30	13	While Ford does not object to this entire designation, Ford does object to certain other portions (or sub-sections) of this particular designation as set forth below.	
22	24	23	24	FRE 402, 403, 602, 611	
24	10	24	15	FRE 106, 403, 403, 611	
24	21	24	25	FRE 602, 611	
25	8	25	19	FRE 402, 403, 611	
26	5	27	12	FRE 106, 402, 403, 602, 611	
29	11	30	6	FRE 106, 402, 403, 602, 611	
					31:7-31:12
33	20	34	6	FRE 611	
					35:2-35:5
35	18	39	16	While Ford does not object to this entire designation, Ford does object to certain other portions (or sub-sections) of this particular designation as set forth below.	
35	18	37	12	FRE 403, 611	
38	16	38	18	FRE 611; Calls for a legal conclusion	
41	15	44	6	FRE 402, 403, 611, 802	
45	23	46	9	FRE 402, 403, 611, 802	
47	9	47	12	FRE 402, 403, 611, 802	
					48:8-48:10 48:15-48:16 49:19-49:25

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
50	19	54	24	While Ford does not object to this entire designation, Ford does object to certain other portions (or sub-sections) of this particular designation as set forth below.	
50	19	51	15	FRE 402, 403, 611, 802	
52	7	54	22	FRE 106, 402, 403, 611, 802	
56	6	57	12	FRE 402, 403, 611, 802	
59	20	60	4	FRE 402, 403, 611, 802	
					64:3-64:9
67	22	69	1	While Ford does not object to this entire designation, Ford does object to certain other portions (or sub-sections) of this particular designation as set forth below.	
68	7	68	24	FRE 402, 403, 611, 802	
69	17	73	3	While Ford does not object to this entire designation, Ford does object to certain other portions (or sub-sections) of this particular designation as set forth below.	
69	17	70	13	FRE 402, 403, 611, 802	
71	21	71	25	FRE 611	
74	13	75	7	FRE 402, 403, 611, 802	
80	25	81	1		

C. From depositions taken in Mills (Brogdon) v. Ford - treating physician and scene witnesses

Deposition of William Ellis taken July 17, 2024.

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
6	1	8	22		

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
					12:8-14:7 15:7-18:3 18:14-43:16 47:3-48:3 49:2-50:19 53:4-53:11 57:10-60:12 60:23-63:23
				If Dr. Ellis is allowed to render opinions on cause of death, then Ford counter designates	64:2-64:24
65	21	67	23	<p>Witness was not designated as an expert (<i>see</i> Ford's motion to exclude medical opinions [Docs. 222, 222-1]; FRE 602, 702</p> <p>Cannot state any opinion to a reasonable degree of medical certainty; Improper speaking objection.</p> <p>The Court denied Ford's motion [Docs. 222, 222-1] to exclude Dr. Ellis under Rules 602 and 702 and based on Plaintiffs' failure to identify them as experts and their failure to render opinions to a reasonable degree of medical certainty. For purposes of the record, Ford maintains these objections and will renew them at trial but understands that the Court has overruled them at this time. [Doc. 297 at p. 11.]</p>	
				If Dr. Ellis is allowed to render opinions on cause of death, then Ford counter designates	68:21-71:3
71	11	72	15	Counsel colloquy; no question to witness	
74	1	77	23		

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
78	1	78	22		
79	8	80	5		
80	6	80	12	<p>Witness was not designated as an expert (<i>see</i> Ford's motion to exclude medical opinions [Docs. 222, 222-1]; FRE 602, 702</p> <p>Cannot state any opinion to a reasonable degree of medical certainty</p> <p>The Court denied Ford's motion [Docs. 222, 222-1] to exclude Dr. Ellis under Rules 602 and 702 and based on Plaintiffs' failure to identify them as experts and their failure to render opinions to a reasonable degree of medical certainty. For purposes of the record, Ford maintains these objections and will renew them at trial but understands that the Court has overruled them at this time. [Doc. 297 at p. 11.]</p>	
80	13	85	6		

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
85	7	85	9	<p>Witness was not designated as an expert (<i>see</i> Ford's motion to exclude medical opinions [Docs. 222, 222-1]; FRE 602, 702</p> <p>Cannot state any opinion to a reasonable degree of medical certainty</p> <p>The Court denied Ford's motion [Docs. 222, 222-1] to exclude Dr. Ellis under Rules 602 and 702 and based on Plaintiffs' failure to identify them as experts and their failure to render opinions to a reasonable degree of medical certainty. For purposes of the record, Ford maintains these objections and will renew them at trial but understands that the Court has overruled them at this time. [Doc. 297 at p. 11.]</p>	
85	10	86	14	FRE 602, 802	
86	15	90	17		
90	18	91	2	FRE 602	
91	3	91	17		
91	18	93	23	FRE 602	
93	24	94	23	Counsel colloquy	
				If Dr. Ellis is allowed to render opinions on cause of death, then Ford counter designates	94:24-95:11
96	2	96	17		

Deposition of Dr. Sydney Cochran taken July 16, 2024.

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
5	9	6	11		
6	12	6	18	Counsel colloquy	
6	19	8	7		
					10:6-7
10	23	11	3	Duplicative	
11	22	14	21		
				If Dr. Cochran is allowed to testify as to opinions on cause of death, then Ford counter designates	14:22-16:14 17:9-18:10
18	11	18	17	Counsel colloquy	
18	18	18	21		
18	22	19	19	Counsel colloquy and speaking objections and repeated question in light of speaking objections	
19	20				
				If Dr. Cochran is allowed to testify as to opinions on cause of death, then Ford counter designates	20:8-20:17
20	18	20	23		
					21:1-21:7 22:1-23:12 24:8-24:21 26:12-27:6 28:13-29:1 29:6-29:11 30:1-31:8 32:7-33:22 35:8-35:13 37:8-38:23

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
				If Dr. Cochran is allowed to testify as to opinions on cause of death, then Ford counter designates	39:14-41:11
					41:18-42:4 42:22-47:4 47:11-48:19 49:7-49:9 50:15-50:21 51:6-52:2 52:9-52:12 53:12-57:22 60:23-61:9 63:15-64:23 69:1-69:23 74:3-76:8 78:23-79:13 83:4-84:12 85:10-88:4 88:14-91:6 91:20-92:1 93:7-93:15 95:11-98:12 99:3-99:13
				If Dr. Cochran is allowed to testify as to opinions on cause of death, then Ford counter designates	101:9-101:18
					103:3-104:13 105:15-106:10
				If Dr. Cochran is allowed to testify as to opinions on cause of death, then Ford counter designates	108:2-108:5

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
112	10	114	21	<p>FRE 602, 702</p> <p>Cannot state any opinion to a reasonable degree of medical certainty;</p> <p>The Court denied Ford's motion [Docs. 222, 222-1] to exclude Dr. Ellis under Rules 602 and 702 and based on Plaintiffs' failure to identify them as experts and their failure to render opinions to a reasonable degree of medical certainty. For purposes of the record, Ford maintains these objections and will renew them at trial but understands that the Court has overruled them at this time. [Doc. 297 at p. 11.]</p>	
114	22	118	5	<p>Witness was not designated as an expert (<i>see</i> Ford's motion to exclude medical opinions [Docs. 222, 222-1]; FRE 602, 702</p> <p>Cannot state any opinion to a reasonable degree of medical certainty;</p> <p>The Court denied Ford's motion [Docs. 222, 222-1] to exclude Dr. Ellis under Rules 602 and 702 and based on Plaintiffs' failure to identify them as experts and their failure to render opinions to a reasonable degree of medical certainty. For purposes of the record, Ford maintains these objections and will renew them at trial but understands that the Court has overruled them at this time. [Doc. 297 at p. 11.]</p>	
118	6	118	12	FRE 602	

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
118	13	120	3	<p>Witness was not designated as an expert (<i>see</i> Ford's motion to exclude medical opinions [Docs. 222, 222-1]; FRE 602, 702</p> <p>Cannot state any opinion to a reasonable degree of medical certainty;</p> <p>The Court denied Ford's motion [Docs. 222, 222-1] to exclude Dr. Ellis under Rules 602 and 702 and based on Plaintiffs' failure to identify them as experts and their failure to render opinions to a reasonable degree of medical certainty. For purposes of the record, Ford maintains these objections and will renew them at trial but understands that the Court has overruled them at this time. [Doc. 297 at p. 11.]</p>	
120	4	123	2	Counsel colloquy	

Deposition of Brian Palmer taken December 14, 2023.

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
5	3	10	16		
					10:17-10:22
10	23	13	19		
14	21	20	19		
20	20	21	12	FRE 602	
					21:21-22:2 27:18-28:4

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
28	18 [sic] Should be 17	28	25		
					29:1-29:3 29:21-30:6 31:17-32:2
33	23	33	10		
					33:11-33:14
33	15	33	17	Incomplete question without 33:10-33:14	
33	18	33	24		
34	3	35	17		
					35:20-35:23
34	24	36	21		
					36:22-38:1
38	2	38	11		
					38:12-39:5
39	6	39	21		
					39:22-40:23
40	24	42	20		
					45:25-47:10
56	5	57	21	Witness is not qualified to render expert opinion on injury causation (see Ford motion in limine); FRE 602 Court sustained these objections in granting Ford' Omnibus Motion in Limine #2 [Doc. 234]. [Doc. 297 at p. 12.]	

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
58	19	59	11	Witness is not qualified to render expert opinion on injury causation (<i>see</i> Ford motion in limine); FRE 602 Court sustained these objections in granting Ford' Omnibus Motion in Limine # 2 [Doc.234]. [Doc. 297 p. 12.]	
				If Officer Palmer is allowed to testify regarding injury causation, then ford counter designates	59:19-60:1
60	2	61	21	Duplicative	
61	25	62	7	No questions	
62	8	62	14		
62	15	62	20	FRE 802 Affidavit not being used for impeachment	
62	21	63	17	Witness is not qualified to render expert opinion on injury causation (<i>see</i> Ford motion in limine); FRE 602, 802 Court sustained these objections in granting Ford' Omnibus Motion in Limine # 2 [Doc. 234]. [Doc. 297 at p. 12]	
63	18	64	19	FRE 802 – Inadmissible Hearsay (The Rule Against Hearsay) Affidavit not being used for impeachment	
66	24	69	9	Leading	
69	13	69	17	Leading	
69	18	70	17	Leading	
71	11	71	13	FRE 602	
72	9	72	14	FRE 402	

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
					76:17-77:17

Deposition of Jacob Sanchez taken January 23, 2024²

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
5	1	6	23		
7	19	14	14[sic] should be 15		
15	9	17	10		
17	11	17	22	FRE 611 Counsel colloquy	
17	23	17	25		
					19:15-19:22
20	22	22	1		
					22:23-26:16
26	17	30	15 [sic] should include answer at 16		
					33:21-33:24
33	25	34	3		
38	20	40	18		
42	3	42	13		
					42:14-43:17
45	21	48	2		
					50:3-51:5 52:5-53:22
53	23	54	14	FRE 602	

² Trooper Sanchez's transcript is incorrectly dated January 23, 2023.

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
					55:14-56:5
56	6	56	12		
					56:13-56:19
56	22	57	3		
					57:15-58:3 58:23-59:10 61:24-62:3 62:12-62:14 73:15-74:6
75	5	75	14		
78	20	79	15	Affidavit not being used by plaintiffs for impeachment	
					79:16-79:21
80	18	81	25	<p>Witness is not qualified to render expert opinion on injury causation (<i>see</i> Ford motion in limine);</p> <p>FRE 602, 702</p> <p>Affidavit is not being used by plaintiffs for improper impeachment</p> <p>Court sustained these objections in granting Ford' Omnibus Motion in Limine # 2 [Doc. 234]. [Doc. 297 at p. 12]</p>	
				If Trooper Sanchez is allowed to testify regarding injury causation, then Ford counter designates	82:1-83:8
83	9	84	10	<p>Witness is not qualified to render expert opinion on injury causation (<i>see</i> Ford motion in limine);</p> <p>FRE 602, 702</p> <p>Court sustained these objections in granting Ford' Omnibus Motion in Limine # 2 [Doc. 234]. [Doc. 297 at p. 12]</p>	

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
84	11	84	20		
84	21	85	4	<p>Witness is not qualified to render expert opinion on injury causation (<i>see</i> Ford motion in limine); FRE 602, 702</p> <p>Court sustained these objections in granting Ford' Omnibus Motion in Limine # 2 [Doc. 234]. [Doc. 297 at p. 12]</p>	
85	5	85	24		
85	25	86	17	<p>FRE 802</p> <p>Plaintiffs may not affirmatively use the affidavit</p>	
86	18	89	14	Plaintiffs moved to exclude reference to no impairment	
90	18	96	3		
97	7	98	22		
98	23	99	18	<p>FRE 402, 602, 802</p> <p>Other unrelated incident</p> <p>Court sustained these objections in granting Plaintiffs' Motion in Limine to Exclude Reference by Lay Persons to Other Rollover Accidents # 6 [Doc. 247 at p. 14]</p>	
99	19	100	20	<p>FRE 802</p> <p>Affidavit not being used by plaintiffs for impeachment</p>	
101	15	102	12	<p>FRE 602, 702</p> <p>Witness not qualified to render expert opinion on restraint system</p>	

Deposition of Anthony Harrison taken December 14, 2023.

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
5	1	11	6		
13	2	13	22		
					14:1-17:14
18	3	25	16		
25	17	25	19	FRE 402, 602	
26	15	28	16		
					28:17-28:21
29	13	30	6		
					31:6-31:14
31	15	32	15		
33	6	34	12		
					34:15-35:3
35	4	37	22		
					39:25-40:10 42:23-42:25
43	1	43	19	Incomplete answer	43:20-43:22
47	23	48	21	FRE 802 Affidavit not being used by plaintiffs for impeachment	
48	22	51	6		
51	7	51	18	Counsel colloquy; No question	
51	19	52	22	FRE 802 Affidavit not being used by plaintiffs for impeachment	
52	23	53	6	Leading	
53	7	54	22		
54	23	55	2	No questions	
55	3	55	18	Leading	
55	19	56	20		

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
56	21	57	1	FRE 402	
57	2	57	23	FRE 402	
57	24	59	9		
59	10	60	24	FRE 611 Leading; Speculation	
60	25	61	17		
61	18	61	23	Leading	
					61:24-62:6
62	11	63	6		
68	4	68	9		
69	18	70	24		

Deposition of Jimmy Cooper taken December 14, 2023.

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
5	4	6	14		
7	10	10	3		
					12:8-12:22
12	23	15	25		
					16:1-16:20 17:13-18:25
19	1	20	3		
					20:14-20:25
21	1	28	8		
				Depending on the Court's ruling on Plaintiffs' Motion in Limine on Witness Tampering, Ford counter designates	33:16-35:1 36:1-37:19
38	1	40	23	FRE 802 Affidavit not being used by plaintiffs for impeachment	

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
40	24	43	2		
43	3	43	12	Leading	
43	13	43	23		
43	24	44	10	Leading	
44	11	45	10		

Deposition of Kristen Drexler taken December 15, 2023.

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
5	2	9	21		
11	5	13	3		
15	7	15	12		
17	2	18	14		
					20:18-20:22
20	23	21	4		
					21:5-21:9 21:16-22:1
23	10	23	18		
24	16	29	10		
					29:11-30:6 30:24-31:4
31	7	37	20		
				Depending on the Court's ruling on Plaintiffs' Motion in Limine on Witness Tampering, Ford may counter designate.	39:7-40:6
41	11	42	14	FRE 802 Affidavit not being used by plaintiffs for impeachment	
					42:24-46:14

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
46	24	49	22	FRE 802 Affidavit not being used by plaintiffs for impeachment	
49	23	50	14		
52	2	52	25		
53	1	53	3	FRE 611	
58	5	58	18		
58	19	59	1	FRE 802 Leading	
62	3	64	1		
66	11	66	21	FRE 802 Affidavit not being used by plaintiffs for impeachment	

8. Deposition of Courtney Pollock taken January 23, 2024³.

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
5	6	7	11		
7	21	10	7		
11	7	12	2		
12	14	12	18		
14	11	16	20		
17	7	17	21	FRE 602, 702 Speculation Court sustained these objections in granting Plaintiffs' Motion in Limine to Exclude Reference by Lay Persons to Other Rollover Accidents # 6 [Doc. 247 at p. 14]	
					18:1-19:8
19	9	21	8		

³ Ms. Pollock's transcript is incorrectly dated January 23, 2023

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
					21:21-22:13
22	14	24	17		
25	1	28	17		
				Depending on the Court's ruling on Plaintiffs' Motion in Limine on Witness Tampering. Ford may counter designate	29:3-30:3
30	10	31	9	FRE 802 Affidavit not being used by plaintiffs for impeachment	
32	11	33	1	FRE 802 Affidavit not being used by plaintiffs for impeachment	
33	22	34	1	FRE 602, 702, 802 Affidavit not being used by plaintiffs for impeachment Court sustained these objections in granting Ford' Omnibus Motion in Limine # 2 [Doc. 234]. [Doc. 297 at p. 12.]	
				If Ms. Pollock is allowed to testify regarding injury causation, then Ford counter designates	34:2-36:6
36	11	37	5		

Deposition of Trenton Russ taken December 15, 2023.

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
5	3	8	19		
9	17	9	23		
10	18	11	9		

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
11	24	13	23		
17	9	18	16		
18	25	23	20		
					23:23-24:9
24	25	27	1	FRE 802 Affidavit not being used by plaintiffs for impeachment	
30	18	32	1	FRE 802 Affidavit not being used by plaintiffs for impeachment	
32	2	33	13		
33	14	33	16	FRE 602, 611	
34	17	34	17	Discussion among plaintiffs' counsel and his staff	
35	9	36	22	FRE 602 Misleading; Leading	
36	23	37	5	FRE 802 Leading	
37	6	38	22		

10. Deposition of Brett Wilkinson taken December 15, 2023.

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
5	3	8	12		
10	9	11	3		
12	23	13	1		
14	1	17	8		
17	22	22	20		
27	25	29	14	Relevance	
29	15	31	1		
					31:2-31:18

Starting Page	Starting Line	Ending Page	Ending Line	Defense Objection	Counter Designation
31	19	32	15		
34	18	36	7		
36	8	36	20	Argumentative; improper influence on witness	

Respectfully submitted this 19th day of December, 2024,

/s/ Michael R. Boorman

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***Attorneys for Defendant
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**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

JAMES EDWARD (“Dusty”) BROGDON, Jr.,	*	
as Executor of the Estate of Debra Sue Mills,	*	
deceased, and JAMES EDWARD BROGDON, Jr.,	*	
and RONALD BRIAN (“Rusty”) BROGDON,	*	
Individually and as surviving children of	*	CIVIL ACTION FILE
Debra Sue Mills,	*	
	*	NO. 4:23-cv-00088-CDL
and	*	
	*	
JAMES EDWARD BROGDON, Jr.,	*	
as Executor of the Estate of Herman Edwin Mills,	*	
deceased, and JASON EDWIN MILLS,	*	
Individually and as surviving child	*	
of Herman Edwin Mills,	*	
	*	
	*	
Plaintiffs,	*	
	*	
	*	
v.	*	
	*	
FORD MOTOR COMPANY,	*	
	*	
	*	
Defendant.	*	

**PLAINTIFFS’ OBJECTIONS TO FORD’S COUNTER-DESIGNATIONS FROM TRIAL
AND DEPOSITION TESTIMONY**

**Hill v. Ford Second Trial Testimony of Ford employee Ramnarian Krishnaswami,
Vol. 10, Hill Transcript.**

Plaintiffs designated certain trial testimony of Ford employee Ramnarian Krishnaswami from the second Hill trial, Volume 10. In response Ford has purported to ‘designate’ not from that testimony, but from that witness’ testimony 8 ½ years earlier at the first Hill trial. See Doc.

298 at 9, “Trial testimony Ram Krishnaswami Hill v. Ford Vol. 15 Trial Transcript.” That is not part of the testimony from which Plaintiffs have designated. Plaintiffs object to that designation.

Other Ford counter-designations

Ford has made 176 other counter-designations (if Plaintiffs’ counsel’s counting is correct). Plaintiffs’ counsel have not had time to study all those counter-designations and render objections thereto. Some objections were made during the testimony of those witnesses. With the Court’s permission, if Plaintiffs insist upon such objections, Plaintiffs’ counsel will make them while the videotape is being played and the Court can then rule upon such objections, in the context of the trial. Frankly, Plaintiffs’ counsel are reluctant to seem to require that the Court decide, in advance of trial, without context, objections to dozens of Ford’s counter-designations.

Respectfully submitted, this 23rd day of December, 2024.

/s/ James E. Butler, Jr.

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